Comments of Larry Schweiger

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To the Environmental Protection Agency and the National Highway and
Traffic Safety Administration on

2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards
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Detroit

Director Oge, Deputy Administrator Medford,

Thank you for the opportunity to comment. I am Larry Schweiger, and I'm President and CEO of the National Wildlife Federation. On behalf of our 4 million members and supporters, it is my pleasure to speak this morning in support of these proposed landmark standards.

I'm pleased to be here in Detroit today. As a one-time GM mechanic, I expect to be even more thrilled when I walk through the auto show this afternoon.

In 2009 when the tide was flowing against the auto industry, National Wildlife Federation stood up to support the auto recovery package. At the time, I believed the U.S. auto industry could innovate to build the kind of clean cars and trucks that consumers – and our environment increasingly demand.

America needs a strong, clean industrial sector that employs millions with good jobs while producing the most efficient products possible. Our members depend on all kinds of vehicles, from small hybrid cars to pick-ups and off-road vehicles and we still believe in the potential of the American auto industry.

Over the past two years, the hardworking people here in Detroit, and in Ohio, Missouri, North Carolina, and across the country have proven – dramatically—that they have what it takes for America to lead in a prosperous clean energy future. Their efforts, combined with these new standards, and effective public and private investment, show how an industry can be retooled to be vibrant in the present, and more relevant and powerful in the future. Strong standards through 2025 are critical to staying on this path.

The standards are also an example of how industry, labor, and conservationists can and must work together to use the Clean Air Act as a tool for innovation and to solve critical environmental, energy and

economic challenges that we face.

These standards deliver!

I've spent the past 8 years all over America, talking with our members and many others who want to see America's outdoor heritage sustained for their children. All too often, our huge demand for oil stands in the way.

Carbon pollution is warming our climate locally and worldwide.

These changes threaten people and global security right now, and they are the most profoundly threatening force against the future of wildlife. Rising temperatures, floods, fires, droughts and ecosystem alterations are creating direct habitat loss, increased invasive species and other threats for wildlife species – many may never adapt.

The 20 million barrels of oil America uses every day account for 40% of the US carbon pollution load that causes climate change.

Meanwhile, when drilling projects go wrong, whole ecosystems are threatened by disasters like the Deepwater Horizon spill in 2010. And smaller leaks and spills, like the recent Enbridge oil spill here in Michigan. Recent pipeline spills do grave harm right in our backyards: to residents, to wildlife like herons, muskrats, ducks, geese, and to decades of community efforts to restore rivers like the Kalamazoo. **Today we have a real opportunity to combat these threats.**

The proposed 2017-2025 standards will double fuel economy of our cars, SUV's and pickups from today's levels to an average of 54.5 miles per gallon by 2025. These vehicles will save America 4 billion barrels of oil and 2 billion metric tons of carbon pollution.

Taken together with light and heavy duty standards being implemented now, the proposed standards will cut carbon pollution over 650 million metric tons a year in 2030 – about 10% of total US carbon pollution today. This is an historic step forward to combat our climate challenge.

Together these standards will cut our demand for oil by 3.4 million barrels per day; more than all the oil we get today from the Persian Gulf, Venezuela and Russia combined.

And as we are ensuring that every car and truck uses less fuel, steady expansion of electric and advanced vehicle technology can take us even further—to a mass market, high performance vehicle fleet that uses little oil and produces near zero pollution.

Deep cuts in the oil we need means less pressure for risky new drilling projects in the Arctic or for clear cutting forest for Canadian tar sands. It means less need for new pipelines, fewer leaks and threats to people, wildlife and our public and private lands.

These standards show we can take real steps to roll back climate change and protect wildlife for generations to come.

These standards don't just deliver for America's outdoor heritage. Consumers save big. The proposed standards will save Americans half a trillion dollars. That's tens of billions of dollars a year American families and businesses can spend at home building jobs instead of overseas for oil. Families and businesses will save more than \$4,000 in the life-cycle cost of a car or truck, after accounting for the costs of more fuel-efficient technology.

For household budgets, doubling fuel economy is like cutting the price of gasoline in half. For those concerned about cutting dependence on foreign oil and reducing pain at the pump, the best place to drill for oil is under the hoods of our cars.

These standards bring innovation and fuel savings to owners of all kinds of vehicles. For many of our members, the outdoor traditions that mean most to them include getting together with family and friends, loading gear into the truck and heading out hunting or fishing. Across the country, communities and businesses that depend on outdoor recreation depend on these trips. For those who rely on larger vehicles, high gas prices hit particularly hard, and achieving robust fuel efficiency improvements is critical and welcome.

Fortunately, today's fuel economy standards don't just focus on cars, but ensure improvement across all vehicle sizes and types to achieve an overall increase in fuel economy and reduction in pollution. And innovation is delivering far better fuel efficiency together with improved power and performance. The standard is essential to delivering cars and trucks that work in the outdoors and for it.

The proposed standard is also critical to regain and sustain our leadership in the most advanced vehicle technologies - including hybrid and electric cars and trucks. These technologies will be critical to combating high fuel prices and environmental challenges, and to the competitiveness of the American auto industry in a changing world.

Investments in cutting edge electric vehicles, and other innovations increase fuel economy across the board, and long-term targets create certainty in a world tyrannized by volatile oil price and availability. Together we must build robust network of innovators, suppliers and

caring consumers to lead the clean global auto industry of the future.

And it's working now.

NWF recently released a report with the UAW and NRDC that found 300 companies in 43 states engaged today in making parts that specifically contribute to increasing fuel economy – spread widely across traditional vehicles, hybrids or new advanced batteries and electric technology. Meanwhile, the auto sector added 100,000 jobs in the past year building and selling the next generation of clean cars and trucks .

That's what it means and why it matters for America to lead in the clean energy economy. The standards you are considering today are essential to sustaining that progress.

For all these reasons, it's not surprising that a recent survey by Consumers Reports found 93% of the public in support of stricter fuel economy standards. They know fuel standards work. They work for wildlife, they work American families, and they work for the auto industry and autoworkers and they work for the economy.

We thank the agencies for your clarity of vision and perseverance in developing this standard. We will be submitting additional technical comments, and appreciate your consideration today.

Thank you.